

**UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE**

RED DRAGON PARTNERS, LLC,

Plaintiff,

v.

TRUTHMD, LLC, GEMMA CUNNINGHAM,  
CHARLES D. ROSEN, GARY L. WILSON,  
and MORGAN ST. JOHN,

Defendants.

Case No.: 1:24-CV-00450-JLH-SRF

**NOTICE OF SERVICE**

The undersigned hereby certifies that on the 30th day of June, 2025, Plaintiff's Initial Disclosure Statement Pursuant to Federal Rule of Civil Procedure 26(a)(1) was served upon the below-named counsel of record by electronic mail at the email addresses indicated:

Michael C. Heyden, Jr., Esq.  
Joseph E. Brenner, Esq.  
GORDON REES SCULLY MANSUKHANI, LLP  
824 N. Market Street, Suite 220  
Wilmington, DE 19801  
mheyden@grsm.com  
jbbrenner@grsm.com

ASHBY & GEDDES

*Of counsel:*

Marcos Daniel Jiménez  
*Admitted Pro Hac Vice*  
Cristina Moreno  
*Admitted Pro Hac Vice*  
LEÓN COSGROVE JIMÉNEZ, LLP  
255 Alhambra Circle, 8th Floor  
Miami, Florida 33134  
Tel: (305) 740-1975  
Email: [mjimenez@leoncosgrove.com](mailto:mjimenez@leoncosgrove.com)  
Email: [cmoreno@leoncosgrove.com](mailto:cmoreno@leoncosgrove.com)

Dated: June 30, 2025

/s/ Marie M. Degnan

Philip Trainer, Jr. (#2788)  
Marie M. Degnan (#5602)  
Randall J. Teti (#6334)  
500 Delaware Avenue, 8th Floor  
Wilmington, DE 19801  
(302) 654-1888  
(302) 654-2067 (facsimile)  
[ptrainer@ashbygeddes.com](mailto:ptrainer@ashbygeddes.com)  
[mdegnan@ashbygeddes.com](mailto:mdegnan@ashbygeddes.com)  
[rteti@ashbygeddes.com](mailto:rteti@ashbygeddes.com)

*Counsel for Plaintiff Red Dragon  
Partners, LLC*